

1 Scott P. Schlesinger (*admitted pro hac vice*)
2 Jonathan R. Gdanski (*admitted pro hac vice*)
3 Jeffrey L. Haberman (*admitted pro hac vice*)
4 **SCHLESINGER LAW OFFICES, P.A.**
5 1212 SE Third Avenue
6 Ft. Lauderdale, FL 33317
7 Telephone: (954) 467-8800
8 Email: Scott@schlesingerlaw.com
9 Email: Jgdanski@schlesingerlaw.com
10 Email: Jhaberman@schlesingerlaw.com

11 *Attorneys for Plaintiffs*

12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**

14 IN RE: JUUL LABS, INC., MARKETING,
15 SALES PRACTICES, AND PRODUCTS
16 LIABILITY LITIGATION

Case No. 19-md-02913-WHO

17 **JOINT STIPULATION AND**
18 **[PROPOSED] ORDER REGARDING**
19 **BRIEFING SCHEDULE**

20 THIS DOCUMENT RELATES TO:

21 *Aragona v. Juul Labs, Inc. et al.*
22 *Case No. 3:20-cv-1928*
23 *Dupree v. Juul Labs, Inc. et al.*
24 *Case No. 3:20-cv-03850*
25 *Lane v. Juul Labs Inc. et al.*
26 *Case No. 3:20-cv-04661*
27 *Legacki v. Juul Labs, Inc. et al.*
28 *Case No. 3:20-cv-01927*
Nessmith v. Juul Labs, Inc. et al.
Case No. 3:19-cv-06344
Sedgwick v. Juul Labs, Inc. et al.
Case No. 3:20-cv-03882
Shapiro v. Juul Labs, Inc. et al.
Case No. 3:19-cv-07428
Tortorici v. Juul Labs, Inc. et al.
Case No. 3:20-cv-03847

22 The undersigned Parties jointly stipulate and agree, subject to the Court's approval, to a
23 revised briefing schedule concerning the dispositive motions contemplated by CMO 17 and CMO 19,
24 and in support thereof state as follows:

25 **WHEREAS**, on January 28, 2025, the Court set a deadline of May 16, 2025, for Defendants
26 to file the dispositive motions contemplated by CMO 17 and CMO 19 in the eight above-referenced
27 matters; a deadline of June 13, 2025, for Plaintiffs to oppose those dispositive motions; and a deadline
28 of July 11, 2025, for Defendants to file any replies in support of their dispositive motions;

WHEREAS, on May 16, 2025, the Parties entered into a Joint Stipulation Regarding Extension of Time for Filing Dispositive Motions (1) extending Defendants’ deadline to file the dispositive motions contemplated by CMO 17 and CMO 19 by seven (7) days, through and including May 23, 2025; (2) setting a deadline of July 11, 2025, for Plaintiffs to oppose any dispositive motions; (3) setting a deadline of August 8, 2025, for Defendants to file any replies in support of their dispositive motions; and (4) staying all dispositive motion briefing deadlines in the *Shapiro* matter until Defendants complete the deposition of Plaintiff Ben Shapiro and the Court rules upon the pending remand motion in that action (ECF No. 4112);

WHEREAS, Defendants filed over thirty (30) respective dispositive motions in the Judicial Council Coordinated Proceedings (“JCCP”) and the Multi-District Litigation (“MDL”) on May 23, 2025;

WHEREAS, due to the press of work in responding to the breadth of Defendants’ dispositive motions filed, Plaintiffs require additional time to provide responses thereto;

WHEREAS, the proposed extensions would not otherwise impact the Court’s administration of the MDL, notwithstanding the hearing currently set on the dispositive motions for August 22, 2025, which shall be rescheduled for a date and time that follows the completion of the revised briefing schedule outlined below;

NOW THEREFORE, the Parties, by and through their undersigned counsel, hereby jointly stipulate, agree, and respectfully request that the Court enter an Order extending the deadlines set forth in CMO 17 and CMO 19 as follows:

Dupree/Tortorici

- Plaintiffs shall file Amended Complaints on or before July 14, 2024.
- Defendants shall file dispositive motions contemplated by CMO 17 and CMO 19¹ within thirty (30) days of the filing of Plaintiffs’ Amended Complaints.

¹ For the avoidance of doubt, the Parties agree that these dispositive motions will be considered their first dispositive motions under CMO 17 and CMO 19, notwithstanding the prior filing of dispositive motions directed to prior iterations of Plaintiffs’ complaints, and Defendants may still file non-duplicative dispositive motions as contemplated by CMO 17, para. 49 and CMO 19, para. 44.

- Plaintiffs shall file oppositions within thirty (30) days of the filing of Defendants' dispositive motions.
- Defendants shall file replies within twenty (20) days of the filing of Plaintiffs' oppositions.

Aragona, Lane, Legacki, Nessmith, Sedgwick

- Plaintiffs shall file oppositions to Defendants' dispositive motions on or before July 25, 2025.
- Defendants shall file replies to Plaintiffs' oppositions on or before August 22, 2025, subject to reasonable extensions of time as needed.

Shapiro

- Defendants shall file oppositions to Plaintiffs' motion for remand within two (2) weeks following the completion of Plaintiff Ben Shapiro's deposition.
- Plaintiffs' shall file replies within one (1) week of the filing of Defendants' oppositions.

Dated: July 11, 2025

Respectfully submitted,

By: Jeffrey L. Haberman

Scott P. Schlesinger (*pro hac vice*)

Jonathan R. Gdanski (*pro hac vice*)

Jeffrey L. Haberman (*pro hac vice*)

SCHLESINGER LAW OFFICE, P.A.

1212 SE Third Avenue

Fort Lauderdale, FL 33317

Tel: (954) 467-8800

scott@schlesingerlaw.com

jgdanski@schlesingerlaw.com

jhaberman@schlesingerlaw.com

By: Timothy S. Danninger

Timothy S. Danninger (*pro hac vice*)

GUNSTER YOAKLEY & STEWART, P.A.

1 Independent Drive, Suite 2300

Jacksonville, 32204

Telephone: (904) 354-1980

Tdanninger@gunster.com

By: David I. Horowitz

David I. Horowitz (SBN 248414)
KIRKLAND & ELLIS, LLP
2049 Century Park East, Suite 3700
Los Angeles, CA 90067
Tel: (213) 680-8374
David.horowitz@kirkland.com

Attorneys for Defendant Juul Labs, Inc.

By: David E. Kouba
David E. Kouba (*pro hac vice*)
ARNOLD & PORTER KAYE SCHOLER LLP
601 Massachusetts Ave, NW
Washington, DC 20001
Tel: (202) 942-5230
David.kouba@arnoldporter.com

By: Lauren S. Wulfe
Lauren S. Wulfe (SBN 287592)
ARNOLD & PORTER KAYE SCHOLER LLP
777 S. Figueroa St., 44th Floor
Los Angeles, CA 90017
Tel: (213) 243-4000
Lauren.wulfe@arnoldporter.com

*Attorneys for Defendants Altria Group, Inc., Philip
Morris USA Inc., Altria Client Services LLC, and
Altria Distribution Company*

By: James Kramer
James Kramer
Catherine Malone
Kevin Askew
ORRICK HERRINGTON & SUTCLIFFE LLP
405 Howard Street San Francisco, CA 94105-2669
Tel: (415) 773-5700
Jkramer@orrick.com
Cmalone@orrick.com
Kaskew@orrick.com

Attorneys for Defendant James Monsees

By: Mark C. Hansen
Mark C. Hansen (*pro hac vice*)
Michael J. Guzman (*pro hac vice*)
David L. Schwarz (*pro hac vice*)
**KELLOGG, HANSEN, TODD, FIGEL &
FREDERICK, P.L.L.C.**

1 1615 M St., N.W., Suite 400
2 Washington, DC 20036
3 Tel: (202) 326-7910

4 *Attorneys for Defendants Nicholas Pritzker, Riaz*
5 *Valani, and Hoyoung Huh*
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: JUUL LABS, INC., MARKETING,
SALES PRACTICES, AND PRODUCTS
LIABILITY LITIGATION

Case No. 19-md-02913-WHO

**[PROPOSED] ORDER REGARDING
BRIEFING SCHEDULE**

THIS DOCUMENT RELATES TO:

Aragona v. Juul Labs, Inc. et al.

Case No. 3:20-cv-1928

Dupree v. Juul Labs, Inc. et al.

Case No. 3:20-cv-03850

Lane v. Juul Labs Inc. et al.

Case No. 3:20-cv-04661

Legacki v. Juul Labs, Inc. et al.

Case No. 3:20-cv-01927

Nessmith v. Juul Labs, Inc. et al.

Case No. 3:19-cv-06344

Sedgwick v. Juul Labs, Inc. et al.

Case No. 3:20-cv-03882

Shapiro v. Juul Labs, Inc. et al.

Case No. 3:19-cv-07428

Tortorici v. Juul Labs, Inc. et al.

Case No. 3:20-cv-03847

**PURSUANT TO STIPULATION AND GOOD CAUSE SHOWING, IT IS HEREBY
ORDERED:**

The deadlines set forth in CMO 17 and CMO 19 are extended as follows:

Dupree/Tortorici

- Plaintiffs shall file Amended Complaints on or before July 14, 2024.
- Defendants shall file dispositive motions contemplated by CMO 17 and CMO 19 within thirty (30) days of the filing of Plaintiffs' Amended Complaints (which, for the avoidance of doubt, shall be deemed to be Defendants' first dispositive motions in these actions, notwithstanding the prior filing of any dispositive motions directed to prior iterations of Plaintiffs' complaints).
- Plaintiffs shall file oppositions within thirty (30) days of the filing of Defendants' dispositive motions.

- Defendants shall file replies within twenty (20) days of the filing of Plaintiffs' oppositions.

- **The August 22, 2025 hearing date on these motions is VACATED.**


Aragona, Lane, Legacki, Nessmith, Sedgwick

- Plaintiffs shall file oppositions to Defendants' dispositive motions on or before July 25, 2025.
- Defendants shall file replies to Plaintiffs' oppositions on or before August 22, 2025, subject to reasonable extensions of time as needed.
- **The August 22, 2025 hearing date on these motions is continued to September 24, 2025, at 10 a.m.**

Shapiro

- Defendants shall file oppositions to Plaintiffs' motion for remand within two (2) weeks following the completion of Plaintiff Ben Shapiro's deposition.
- Plaintiffs' shall file replies within one (1) week of the filing of Defendants' oppositions.

DATED: July 11, 2025


HONORABLE WILLIAM H. ORRICK
United States District Judge